

EXHIBIT P

1 - TINA McDONALD -

2 UNITED STATES DISTRICT COURT
3 SOUTHERN DISTRICT OF NEW YORK

4 -----X

5 FOX, ET AL.,

6 V. CIVIL CASE NO.

7 1:19-CV-04650-AJN-SN

8
9 STARBUCKS CORPORATION,

10 Defendant.

11 -----X

12 DATE: August 27, 2020

13 TIME: 10:00 A.M.

14
15 VIDEOCONFERENCE DEPOSITION OF TINA

16 McDONALD, pursuant to Notice, before Hope Menaker,
17 a Shorthand Reporter and Notary Public of the
18 State of New York.

1 - TINA McDONALD -

2 about Hot Shots?

3 A. No. No, I did not.

4 Q. What was it that you anticipated Mr.
5 Fox's district manager would do in response to the
6 information that Mr. Fox was sharing with you?

7 MR. MOY: Objection.

8 A. Did I say that I anticipated him
9 doing anything?

10 Q. I should not have inferred that.
11 When you told Mr. Fox to take his
12 concern to his district manager who you indicated
13 was Tim Hutchinson what, if anything, did you
14 anticipate that Tim Hutchinson might do with the
15 information?

16 A. I could not -- I can't specifically
17 anticipate what Tim would do necessarily as far as
18 a district manager, because I'm -- I was not
19 familiar with how they go about navigating through
20 those particular situations as I was never a
21 district manager.

22 I'm just aware at that time as a
23 compliance specialist, which is still the same
24 level as a store manager, that when things like
25 this happen you escalate them to your DM. So I'm

1 - TINA McDONALD -

2 not sure what Tim was going -- what would be the
3 next course of action; that type of information I
4 would not have had visibility to.

5 Q. What date, if you can recall, was
6 your conversation with Mr. Fox?

7 A. I cannot recall a specific date.
8 I -- I believe it was within the month of January.

9 Q. January, 2018?

10 A. Yes. January, 2018.

11 Q. Did you ever circle back with the
12 district manager Mr. Hutchinson at all to follow
13 up on whether Rafael Fox had been in touch with
14 him?

15 A. I did not have any conversation with
16 Tim, as that was not within my scope of work to
17 address that.

18 I was there to address compliance
19 specific to the Fair Workweek legislation.

20 MR. GRAFF: Counsel, without
21 attempting to try even to anticipate on the
22 record I would like to note, and we can mark
23 the record here, I believe from the witness'
24 responses that she is not adequately prepared
25 to testify as to Starbucks' corporate